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Attorney for Central Transport International, Inc.

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UNITED STATES BANKRUPTCY COURT :
SOUTHERN DISTRICT OF NEW YORK :
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In re: :
: : Chapter 11
DELPHI CORPORATION, et al., :
: : Case No. 05-44481
Debtors. :
: :
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**RESPONSE TO REORGANIZED DEBTORS' FORTY-THIRD OMNIBUS
CLAIMS OBJECTION TO PROOF OF CLAIM NO. 18667 FILED
BY CENTRAL TRANSPORT INTERNATIONAL, INC.**

Central Transport International, Inc. ("CTII"), by its counsel, Steinberg Shapiro & Clark, files this response to Debtors' Forty-Third Omnibus Claims Objection to Proof of Claim No. 18667 Filed by CTII (the "Objection"), and states as follows:

1. On October 8 and 14, 2005, the Debtors filed voluntary petitions in this Court for reorganization relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as then amended (the "Bankruptcy Code"). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession under Bankruptcy Code sections 1107(a) and 1108. This Court has ordered joint administration of these cases.
2. During the pendency of the Chapter 11, Debtors contracted with CTII for CTII to provide shipping and logistical services to the Debtors.

3. Debtors' contract for shipping and logistical services from CTII was in the ordinary course of business of Debtors and otherwise authorized by 11 U.S.C. § 363 or other sections of the Bankruptcy Code.

4. From October 15, 2005 through December 20, 2006, CTII provided shipping services to the Debtors in the amount of \$89,972.35. An itemized list of the invoices for this time period is attached as Exhibit "A".

5. During the relevant time periods, Debtors contracted with Data2Logistics to conduct freight bill audit and payment processing for the Debtors.

6. Pursuant to the parties' standard operating procedures, typically within one week of submitting invoices electronically, CTII submitted a hard copy of all invoices to Data2Logistics for audit and processing for payment.

7. Subsequently, in April of 2007, Data2Logistics requested and CTII provided a list of all outstanding invoices in electronic spreadsheet format.

8. Upon receipt of the electronic spreadsheet in April of 2007, Data2Logistics affirmatively indicated that the invoices were being processed for payment.

9. Despite numerous demands, Debtors have failed and/or refused to pay \$89,972.35 to CTII for shipping and logistical services contracted by Debtors during the pendency of the Chapter 11.

10. Pursuant to 11 U.S.C. § 507,

(a) An entity may timely file a request for payment of an administrative expense, or may tardily file such request if permitted by the court for cause.

(b) After notice and a hearing, there shall be allowed, administrative expenses, other than claims allowed under section 502(f) of this title [11 USCS § 502(f)], including--

(1) (A) the actual, necessary costs and expenses of preserving the estate.

11. The \$89,972.35 owed to CTII by Debtors arose from transactions with the Debtors as debtor-in-possession during the pendency of the Chapter 11 proceedings.

12. Pursuant to *Trustees of Amalgamated Ins. Fund v. McFarlin's, Inc.*, 789 F.2d 98, 101 (2d Cir. N.Y. 1986), an expense is entitled to administrative priority if (i) it arises out of a transaction between the creditor and the debtor in possession, and (ii) the consideration supporting the claimant's right to payment was both supplied to and beneficial to the debtor-in-possession in the operation of the business.

13. CTII's claim for \$89,972.35 arises out of shipping services provided directly to the Debtors and said shipping services were beneficial to the Debtors' operation of the business.

14. In accordance with *McFarlin's, Inc., supra*, and 11 U.S.C. § 503(b)(1)(A), CTII is entitled to allowance of an administrative claim in the amount of \$89,972.35.

15. Beyond mere denial, Debtors have not presented any evidence to dispute the validity of CTII's Administrative Proof of Claim. As such, the Debtors' objection should be overruled.

WHEREFORE, for the reasons set forth above, Central Transport International, Inc., by its counsel, Steinberg Shapiro & Clark, requests the Court deny the Debtors' Forty-Third Omnibus Claims Objection to Proof of Claim No. 18667 Filed by Central Transport International, Inc. and allow Central Transport International, Inc.'s Administrative Proof of Claim as a administrative claim in the amount of \$89,972.35.

STEINBERG SHAPIRO & CLARK

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Date: February 18, 2010

ProNum	BillDate	Amount
4634808929DB	10/10/2005	\$81.57
4532059855DB	10/10/2005	\$751.72
4532059848DB	10/10/2005	\$262.57
3921523331DB	10/10/2005	\$163.89
6413781622DB	10/11/2005	\$76.46
4053992500DB	10/11/2005	\$1,756.80
7993521671DB	10/12/2005	\$26.51
5513737863DB	10/12/2005	\$5.04
4532059509DB	10/12/2005	\$726.03
4634809026DB	10/13/2005	\$50.35
4532059657DB	10/13/2005	\$626.03
4532059541DB	10/13/2005	\$264.74
7993527306DB	10/14/2005	\$150.90
7993527314DB	10/17/2005	\$64.90
7803609039DB	10/17/2005	\$50.18
4532060200DB	10/17/2005	\$699.04
4634733655DB	10/18/2005	\$42.37
4531984707DB	10/19/2005	\$628.06
4532066363DB	10/20/2005	\$247.30
7993522406DB	10/21/2005	\$50.18
7993521960DB	10/21/2005	\$50.18
7803644523DB	10/21/2005	\$36.23
7993521879DB	10/24/2005	\$50.40
7993475738DB	10/24/2005	\$50.40
7993475644DB	10/24/2005	\$50.40
4532066553DB	10/24/2005	\$624.00
3524419297DB	10/24/2005	\$29.96
3524419289DB	10/24/2005	\$21.06
4664194049DB	10/26/2005	\$42.94
4634753398DB	10/26/2005	\$13.61
4532067130DB	10/31/2005	\$2,681.70
1424067757DB	10/31/2005	\$191.03
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6413651627DB	11/7/2005	\$89.67
2931004639DB	11/7/2005	\$205.46
7803649225DB	11/10/2005	\$142.04
7803644630DB	11/10/2005	\$117.73
4530560392DB	11/11/2005	\$220.07
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7993564622DB	11/21/2005	\$64.03
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3524394995DB	11/29/2005	\$274.24
1424067799DB	11/30/2005	\$63.01
7803913316DC	12/1/2005	\$25.00
7803606175DB	12/2/2005	\$58.82

4532076792DB	12/7/2005	\$41.23
3524415006DC	12/9/2005	\$1,573.02
1424109773DB	12/12/2005	\$61.75
7993597184DB	12/15/2005	\$48.83
4930912972DB	12/16/2005	\$41.23
4532064996DB	12/16/2005	\$41.23
7853717949DB	12/19/2005	\$48.60
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4634619904DB	12/22/2005	\$41.64
4634619888DB	12/22/2005	\$41.04
4530462242DB	12/30/2005	\$43.20
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7993566270DB	1/4/2006	\$291.17
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7853681087DB	1/9/2006	\$48.60
4934006961DB	1/12/2006	\$160.96
3561835909DB	1/12/2006	\$48.60
7993592466DB	1/13/2006	\$48.60
4637430275DB	1/13/2006	\$41.04
4530568535DB	1/13/2006	\$41.04
5343451929DB	1/17/2006	\$43.20
4532113314DB	1/19/2006	\$43.20
1482403079DB	1/23/2006	\$105.97
486453089DC	1/27/2006	\$12.24
7853695228DB	1/31/2006	\$48.60
4530578112DB	1/31/2006	\$43.20
7853694429DB	2/1/2006	\$48.60
7803924222DB	2/1/2006	\$141.63
7803915204DB	2/2/2006	\$88.84
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4532073286DB	2/23/2006	\$74.28
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4532094662DB	2/24/2006	\$43.40
4934083143DB	2/28/2006	\$108.17
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1460404194DB	3/2/2006	\$49.14
9992270668DB	3/3/2006	\$41.23
4864675344DB	3/6/2006	\$48.60
4934083705DB	3/7/2006	\$48.60
5513934205DB	3/8/2006	\$7.56
4532127314DB	3/8/2006	\$699.88
4703902822DB	3/9/2006	\$49.44
4635026075DB	3/10/2006	\$48.60
4532100964DB	3/14/2006	\$43.40
4361572536DB	3/14/2006	\$43.40
4532128205DB	3/15/2006	\$599.04

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4532101616DB	3/16/2006	\$43.40
4532128635DB	3/17/2006	\$618.80
4532143246DB	3/23/2006	\$624.00
0550347484DB	3/23/2006	\$36.59
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4532152627DB	3/27/2006	\$624.00
7804078960DB	3/28/2006	\$285.04
4532153906DB	3/29/2006	\$624.00
4532155356DB	3/30/2006	\$624.00
7804078863DB	3/31/2006	\$200.78
7804078556DB	3/31/2006	\$240.93
4532155539DB	3/31/2006	\$624.00
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1462425569DC	4/4/2006	\$43.60
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3173859675DB	4/5/2006	\$2,855.85
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7853779634DB	4/7/2006	\$49.05
7853770369DB	4/7/2006	\$49.05
45321428121DB	4/7/2006	\$661.60
4532149391DB	4/10/2006	\$618.80
4532100634DB	4/11/2006	\$43.60
4532131167DC	4/17/2006	\$16.33
7993684685	4/20/2006	\$74.65
4532148393DB	4/20/2006	\$49.28
7804011149DB	4/24/2006	\$247.62
3725191101DB	4/26/2006	\$85.18
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4532147874DB	4/27/2006	\$43.80
4532147833DB	5/1/2006	\$44.20
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4532163608DB	5/3/2006	\$44.20
7993710506DB	5/4/2006	\$72.42
3725252846DB	5/5/2006	\$85.95
1462447746DB	5/8/2006	\$49.73
7804041513DB	5/9/2006	\$401.71
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4703872926DB	5/11/2006	\$84.84
4635062393DB	5/11/2006	\$137.69
5343525144DB	5/12/2006	\$44.20
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3725180542DB	5/12/2006	\$85.33
3524356721DB	5/12/2006	\$60.38
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4934219648DB	5/22/2006	\$44.60
4532174548DB	5/22/2006	\$53.39

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4532194983DB	5/26/2006	\$50.18
4532166692DB	5/26/2006	\$44.60
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4532158293DB	5/30/2006	\$44.60
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4934229001DB	6/2/2006	\$44.60
4934219721DB	6/2/2006	\$42.37
1424186938DB	6/2/2006	\$42.37
7804121489DB	6/6/2006	\$254.68
7804121265DB	6/5/2006	\$254.68
7804089702DB	6/5/2006	\$254.68
4934227823DB	6/5/2006	\$44.60
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1424190203DB	6/12/2006	\$63.35
7804032330DB	6/14/2006	\$71.74
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1462476372DB	6/14/2006	\$44.40
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7853756418DB	6/19/2006	\$42.18
4532189603DB	6/20/2006	\$49.33
7804032470DB	6/21/2006	\$201.83
7804032462DB	6/21/2006	\$201.83
7804032405DB	6/21/2006	\$201.83
7804032397DB	6/21/2006	\$201.83
7804032322DB	6/21/2006	\$201.83
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4532264836DB	6/26/2006	\$44.60
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4532188480DB	6/27/2006	\$44.60
4635209861DB	6/28/2006	\$53.39
4532266864DB	6/28/2006	\$44.60
4532188464DB	6/29/2006	\$44.60
9992403921	6/30/2006	\$506.85
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1424190997DB	7/5/2006	\$144.59
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4703872918DB	7/13/2006	\$50.18
4934286274DB	7/17/2006	\$167.09
4934266896DB	7/20/2006	\$47.71

Exhibit B-1

4532214781	7/24/2006	\$763.26
453221333DB	7/24/2006	\$44.60
4934295648DB	7/25/2006	\$42.37
4532280808DB	7/25/2006	\$55.04
4532214922	7/25/2006	\$801.42
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3524445607	7/25/2006	\$687.11
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3173850716DB	8/8/2006	\$12.95
4428867228DB	8/9/2006	\$25.00
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4532219343DB	8/14/2006	\$44.80
1473163433DB	8/14/2006	\$75.73
7993829652DB	8/15/2006	\$50.40
7804121588DB	8/17/2006	\$101.80
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4934311957DB	8/22/2006	\$42.76
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2934905840DB	8/30/2006	\$1,393.31
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3524571766DB	8/31/2006	\$50.63
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7994022695DB	9/19/2006	\$50.18
2934917308DB	9/19/2006	\$194.12
1424256467DB	9/19/2006	\$50.18
7994032074	9/20/2006	\$100.13
9203035516DB	9/21/2006	\$128.63

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4532358265DB	9/22/2006	\$44.60
4532352177DB	9/25/2006	\$44.40
7804030797DB	9/26/2006	\$99.45
4637888498DB	9/27/2006	\$44.40
4637813546DB	9/27/2006	\$44.40
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3725551478DB	9/29/2006	\$49.95
4934365474DB	10/2/2006	\$41.80
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4637813918DB	10/2/2006	\$44.00
4637813819DB	10/2/2006	\$44.00
1582427524DB	10/2/2006	\$1,059.00
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4704020103DB	10/4/2006	\$33.20
4532375947DB	10/4/2006	\$2,141.89
5203971793DB	10/5/2006	\$267.80
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7994030375DB	10/6/2006	\$60.59
2934930806DB	10/6/2006	\$197.32
6414135547DB	10/9/2006	\$287.18
4637868482DB	10/9/2006	\$43.80
2825547906DC	10/9/2006	\$1,757.99
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9203035912DB	10/11/2006	\$203.36
45323688116DB	10/11/2006	\$64.83
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4345090386DB	10/16/2006	\$2,712.09
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4934931077DB	10/20/2006	\$43.25
7804030656DB	10/23/2006	\$177.44
7804030649DB	10/23/2006	\$177.44
4532381283DC	10/23/2006	\$2,219.77
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7804765475DB	11/8/2006	\$41.61
5343779097DC	11/8/2006	\$42.28
5052142594DB	11/8/2006	\$239.42
5051767565DB	11/8/2006	\$62.16
4866596241DB	11/8/2006	\$16.47
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4532563484DB	11/8/2006	\$82.88
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4532623114DB	11/21/2006	\$40.08
4345489216DB	11/21/2006	\$2,737.38
7804031621DB	11/22/2006	\$111.61
1462660538DB	11/22/2006	\$155.90
7804758306DB	11/27/2006	\$56.15
3562102903DB	11/27/2006	\$107.33
7804765863DC	11/28/2006	\$2,382.23
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4934928248RC	12/1/2006	\$334.13
4866770408RC	12/1/2006	\$214.07
4345473962BB	12/1/2006	\$29.15
4773890308DB	12/6/2006	\$6.37
7854225322DC	12/7/2006	\$22.60
4934927489DD	12/7/2006	\$173.39
3562102960DB	12/11/2006	\$109.58
4532620011DB	12/13/2006	\$5.21
4866742944DC	12/14/2006	\$9.24
7804758629DB	12/18/2006	\$35.67
5052163988DB	12/19/2006	\$219.42
4652776219DB	12/19/2006	\$42.49
6022925212DC	12/20/2006	\$21.57
4866876510DB	12/20/2006	\$6.50